



MEMO ENDORSED

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April 10, 2025

VIA ECF

Honorable Jessica G.L. Clarke, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

Re: Parker v. Bursor, 24-cv-245 (JGLC) (RFT)

Dear Judge Clarke:

This Firm, along with Judd Burstein, P.C., represents Defendants Scott Bursor and Bursor & Fisher, P.A. (collectively, "Defendants") in the above-referenced matter.

Pursuant to Your Honor's March 31, 2025 Opinion and Order (ECF No. 345 at 29), we write, jointly with counsel for Plaintiff Angelica Parker, to request "additional briefing regarding whether the Court may exercise general jurisdiction over B&F and Bursor," and propose the following schedule:

- On or before April 17, 2025, Plaintiff will submit additional briefing¹; and
- On or before April 24, 2025, Defendants may submit a responsive brief.

In addition, we enclose the Declaration of Scott A. Bursor, dated December 18, 2024, which is the declaration regarding jurisdictional discovery referenced in the Court's Opinion and Order. Concurrently herewith, Defendants are filing a letter motion seeking leave to file the declaration under seal because it contains sensitive financial and accounting information.

We thank the Court for its continued attention to this matter.

Respectfully submitted,

Christine A. Amalfe

cc: All counsel of record (via e-mail)

Application GRANTED. Parties to brief by the proposed deadlines. The declaration will remain temporarily sealed, and the Court will determine whether the declaration shall remain permanently sealed when deciding the underlying issue. The Clerk of Court is directed to terminate ECF No. 370.

SO ORDERED.

JESSICA G. L. CLARKE
United States District Judge

Dated: April 11, 2025
New York, New York

¹ As Plaintiff's briefing will make clear, it is her position that a decision regarding general jurisdiction is premature given that not a single deposition has taken place in this matter. At a minimum, certain B&F employees, as well as Mr. Bursor, need to be deposed.